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*Ultimate Fighting Championship and UFC*

24 **UNITED STATES DISTRICT COURT**

25 **DISTRICT OF NEVADA**

26 Cung Le, Nathan Quarry, Jon Fitch, Brandon  
27 Vera, Luis Javier Vazquez, and Kyle Kingsbury,  
28 on behalf of themselves and all others similarly  
situated,

29 Plaintiffs,

30 v.

31 Zuffa, LLC, d/b/a Ultimate Fighting  
32 Championship and UFC,

33 Defendant.

34 No.: 2:15-cv-01045-RFB-(PAL)

35 **DECLARATION OF STACEY K.  
GRIGSBY IN SUPPORT OF JOINT  
MOTION TO CONDITIONALLY  
FILE UNDER SEAL PLAINTIFFS'  
REPLY STATEMENT REGARDING  
RULE 23 STANDARDS (ECF NO.  
646) AND PLAINTIFFS' RESPONSE  
TO ZUFFA, LLC'S PROPOSAL  
REGARDING THE TREATMENT OF  
PROTECTED MATERIAL FOR THE  
EVIDENTIARY HEARING ON  
CLASS CERTIFICATION (ECF NO.  
639)**

1 I, Stacey K. Grigsby, declare as follows:

2           1. I am a member in good standing of the bar of the District of Columbia and the bar of  
3 the State of New York. I am admitted *pro hac vice* to practice before this Court. I am a Partner in  
4 the law firm Boies Schiller Flexner LLP (“BSF”), counsel for Zuffa, LLC (“Zuffa”) in the above  
5 captioned action in the U.S. District Court for the District of Nevada, *Le et al. v. Zuffa, LLC*, No.  
6 2:15-cv-01045-RFP-PAL.

7        2. I make this declaration in support of the Joint Motion to Conditionally File Under  
8 Seal Plaintiffs' Reply Statement Regarding Rule 23 Standards and Plaintiffs' Response to Zuffa,  
9 LLC's Proposal Regarding the Treatment of Protected Material for the Evidentiary Hearing on Class  
10 Certification. Based on my personal experience, knowledge, and review of the files, records, and  
11 communications in this case, I have personal knowledge of the facts set forth in this Declaration and,  
12 if called to testify, could and would testify competently to those facts under oath.

13       3.     Exhibit A to this Declaration is a true and correct copy of Plaintiffs' Reply Statement  
14     Regarding Rule 23 Standards with fewer redactions than the publicly filed version of that document,  
15     initially filed as ECF No. 639.

16           4.     Exhibit B to this Declaration is a true and correct copy of Plaintiffs' Response to  
17 Zuffa, LLC's Proposal Regarding the Treatment of Protected Material for the Evidentiary Hearing  
18 on Class Certification with fewer redactions than the publicly filed version of that document, initially  
19 filed at ECF No. 640.

I declare under penalty of perjury under the laws of the United States of America that the foregoing facts are true and correct. Executed this 28th day of January, 2019 in Washington, DC.

/s/ Stacey K. Grigsby

Stacey K. Grigsby